0008

February 28, 2003

TO: Internal File

THRU: Daron R. Haddock, Permit Supervisor

FROM: Priscilla W. Burton, Sr. Reclamation Specialist/Soils

RE: Technical Field Visit, Coal Stockpile Increase, Wildcat Loadout, Andalex Resources Inc., C/007/033

Other Attendees:

Mr. Mike Glasson, Senior Geologist, Andalex Resources
Mr. Dan Guy, PE/Engineer, Blackhawk Engineering
Ms. Jerriann Ernstsen, Mr. Jim Smith, Mr. Pete Hess, DOGM

Date & Time: February 26, 2003, 9:00 a.m. – 12:00 p.m.

PURPOSE:

To discuss permitting requirements for expanding the coal stockpile.

OBSERVATIONS:

Plate 1 Wildcat Loadout Surface Facilities As Constructed shows the location of Sediment Pond A and Topsoil Storage Pile A. Plans are to create an additional stockpile to the south and east across the road. The stockpile would be fed by a grasshopper conveyor and ultimately have the height of 40 feet. The additional stockpile would cover approximately 10 acres, with the capacity for storage of 250 - 350,000 Tons of coal.

The first phase of expansion would add one acre of coal stockpile on the southeast side of the haul road PR-5 adjacent to Sediment Pond A. The second phase of expansion would bring the stockpile to the southeast edge of the permit area, adjacent to the existing improved road. It would engulf Sediment Pond A, Sediment Pond B, Topsoil Storage Pile A, and the Revegetation Reference Area. In addition, the second phase of expansion would increase the Mine Run Coal Storage Area to cover Sediment Pond D. Sediment Pond D would be moved to the east side of haul road PR-2.

The area proposed for a new reference area is at the north end of the permit area, across the wash (ND 1) from the disturbed area, on the slope below the county road. The proposed reference area was photographed.

Soil from Topsoil pile A and the soils salvaged from the new disturbance will be taken to Topsoil pile B. Topsoil B was recently reseeded in December 2002. Topsoil A was recently reseeded in June 2002 (see inspection reports). Topsoil B used to have test plots on its surface. The test plots were installed in 1994 as described on page 52 of the MRP. An evaluation of the test plots was not found in the annual reports or the MRP, but Mr. Glasson indicated that those test plots were evaluated a couple of years ago.

Appendix N of the MRP has an evaluation of the revegetation test plots located on the fill. These revegetation test plot locations are shown on Plate 1 and were installed in 1989 as described on page 51 of the MRP. The revegetation tests plots have not been very successful and the potential for trying new reclamation techniques was discussed.

The area designated for expansion has been heavily impacted by coal fines (see photograph). There's greater than six inches accumulated near the road and it dwindles down to about one inch on the reference area four hundred feet from the road. The first thing that the survey should delineate is the depth of coal fines to be removed prior to soil salvage, then the depth of soil salvage.

On page 80, the MRP describes five stockpiles (A – E) holding 419,823 cubic ft of soil (15,549 CY). At a replacement depth of six inches, the 56-acre site has a deficit of 30,000 cu yds of soil, (page 51 of the MRP). This is really a golden opportunity to obtain some more topsoil. The Carbon County soil survey classifies the undisturbed soils in the Wildcat area as Map Unit 52, Hernandez family 3-8% slopes. These deep soils could supply a lot more than six or twelve inches of topsoil.

Photos from this date can be viewed at:
ftp://ogm.utah.gov/PUB/MINES/coal/007033/Images

RECOMMENDATIONS/CONCLUSIONS:

Soils in the area of expansion will be salvaged. Prior to disturbance the soils in the area of expansion should be surveyed and described and sampled for laboratory analysis. The submittal should include a revision of the text and plates where topsoil stockpiles are described, including cross-sections of the topsoil piles as constructed. The submittal should include the summary of the test plots once located on Topsoil Pile B.

The additional stockpile will require a modification of the air quality permit. The potential for coal fines leaving the permit area if the coal stockpile is so close to the permit boundary was mentioned with the possibility of expanding the permit area discussed as well as reducing the coal stockpile in size. The use of wind fences to control particulate was discussed.

Reclamation techniques used on the reconstructed topsoil pile should include gouging, mulching, seeding, and netting. Rainfall patterns at the site (Table III-1 page 31 of the MRP) indicate that the best time for seeding may be during the late summer months rather than late fall. Some success was noted in seeding Topsoil Pile A during the month of June 2002.

cc: All Attendees
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